

DOCKET NO. 200-126-E

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the below requests shall be labeled using the same numbers as used herein.
- C. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the Interrogatory response in the appropriate sequence.
- D. That any inquiries and communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- E. That all exhibits be reduced to 8½" x 11" format.
- F. That the requested information be bound in ring binders (loose leaf notebook) or otherwise bound.
- G. That, in addition to the signature and verification at the close of the Company's

responses, the Company witness(es) or employee(s) responsible for the information contained in each answer be indicated.

- H. That each of these Interrogatories be reproduced at the beginning of each of the responses.
 - I. That the Company provide the Consumer Advocate two (2) copies of the responses to these Interrogatories by **May 14, 2004**.
 - J. If the response to any Interrogatory is that information requested is not currently available, state when the information will be available.
 - K. These interrogatories shall be deemed continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
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- 1-1. Response to Consumer Advocate interrogatory 1-3 in Docket No. 2004-2-E provided forecasted monthly output (GWH), fuel costs, heat rates, capacity factors, etc. by production resource for 2004 and 2005. With respect to each production resource (generation and purchased power), please provide the following in the greatest level of detail available (e.g., by hour, typical day, typical week, etc.) for each production resource as it relates to the amounts provided in response to Consumer Advocate interrogatory 1-3:
 - (a) maximum rated capacity by specific unit(s), or contractual amount;
 - (b) indication as to whether must run or economic dispatch, and/or other circumstances bear on the production resource utilization;
 - (c) order in system dispatch (from first dispatched to last dispatched);
 - (d) variable operating cost per KWh (λ); and,
 - (e) maximum load.
 - 1-2. With respect to the forecasted monthly peak loads for 2005 (MW) provided in response to Consumer Advocate interrogatory 1-3, please provide the contribution (MW) of each source of supply for each month.
 - 1-3. With respect to the forecasted monthly fuel costs for Jasper in response to Consumer Advocate interrogatory 1-3, do these fuel cost amounts include only the forecasted commodity cost of gas, or are other costs included each month, e.g., demand charges, other operating costs, etc? Please provide an explanation of the response.
 - 1-4. With respect to the monthly forecasted fuel costs for Jasper in response to Consumer Advocate interrogatory 1-3 please provide the details of how each cost (\$/MBTU) is determined for each of the months, e.g., \$6.26 for January 2005.

- 1-5. With respect to the forecasted supply of gas from SEMI to Jasper, please provide the forecasted monthly Dth to be provided separately from each of SONAT and LNG (Elba Island).
- 1-6. Is any capacity or output of Jasper dedicated to any sale or use other than SCE &G native load? If yes, please provide the details of these non-native Jasper load or sales requirements.
- 1-7. Does the proposed contract with SEMI for 120,000 Dth/day reflect the gas requirements for all three (3) Jasper generators (units) on a combined basis? If no, please explain.
- 1-8. Do any agreements between SCANA Resources Inc. and Southern Natural Gas Company involve, or in any way relate to, the supply of gas for the Jasper facility? If the response is yes, please explain.
- 1-9. Please explain why, in order to supply the Jasper plant with natural gas, a construction of an entirely new pipeline (SCG Pipeline) was necessary as opposed to extending the existing SCPC. Please explain also the relevance of the existing SCPC pipe connection to the Jasper site.

Respectfully submitted:

Elliott F. Elam, Jr.
Acting Consumer Advocate

Hana Pokorna-Williamson
Staff Attorney

BY: _____
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Post Office Box 5757
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(803) 734-4188

May 6, 2004
Columbia, South Carolina

CERTIFICATE OF MAILING

This is to certify that I, Hana Pokorna-Williamson, on behalf of Elliott F. Elam, Jr., Acting Consumer Advocate for the State of South Carolina, have served a copy of the foregoing Petition to Intervene on the persons named below, at the addresses set forth, by first class mail, this 6th day of May, 2004.

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